



Notice of Service of Process

Transmittal Number: 20204499
Date Processed: 08/07/2019

Primary Contact: Bruce Buttaro
Liberty Mutual Insurance Company
175 Berkeley Street
Boston, MA 02116

Entity:	Liberty Mutual Insurance Company Entity ID Number 1765547
Entity Served:	Liberty Mutual Insurance Company
Title of Action:	Leaza Greenroad-Ford vs. Liberty Mutual Insurance Company
Document(s) Type:	Citation/Petition
Nature of Action:	Contract
Court/Agency:	Orange County District Court, TX
Case/Reference No:	A190277-C
Jurisdiction Served:	Texas
Date Served on CSC:	08/07/2019
Answer or Appearance Due:	10:00 am Monday next following the expiration of 20 days after service
Originally Served On:	CSC
How Served:	Certified Mail
Sender Information:	David Dies 409-883-0892

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

EXHIBIT
A

CIVIL CITATION – CITCVWD

THE STATE OF TEXAS

To: **Liberty Mutual Insurance Company**
RA: Corporation Service Company
211 East 7th Street, Suite 620
Austin TX 78701-3218

Defendant, **NOTICE:**

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A. M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Said **ANSWER** may be filed with the District Clerk's Office, Orange County Courthouse, 801 W Division Ave, Orange Texas 77630.

Said **PLAINTIFF'S ORIGINAL PETITION**

was filed and docketed in the Honorable 128th District Court of Orange County, Texas at the District Clerk's Office at the Orange County Courthouse, 801 W Division Ave, Orange, Texas on July 25, 2019 in the following styled and numbered cause:

Cause No: A190277-C

Leaza Greenroad-Ford vs. Liberty Mutual Insurance Company

The name and address of the attorney for plaintiff otherwise the address of Plaintiff is:

David Dies
1703 Strickland Dr
ORANGE TX 77630

ISSUED AND GIVEN under my hand and seal of said Court at Orange, Texas, this July 26, 2019.



VICKIE EDGERLY, District Clerk
Orange County, Texas

Vickie Edgerly

RETURN

Came to hand on the 2 day of August, 2019, at 5:03 o'clock P, M., and executed in Texas County, Texas, at 10:05 o'clock A M., on the 5 day of August, 2019, by delivering, in accordance with the requirements of law, to the within named Liberty Mutual Ins. In person, a true copy of this citation together with the accompanying copy of the petition, having first endorsed thereon the date of delivery.

And not executed as to the defendant _____
the diligence used to execute being _____
the cause of failure to execute is _____
the defendant may be found _____

TOTAL FEES: _____

BY: *[Signature]* A 373

FILED: 7/29/2019 4:39 PM
Vickie Edgerly, District Clerk
Orange County, Texas
Reviewed By: Annette Vaughan

Cause No. A190277-C

LEAZA GREENROAD-FORD	§	IN THE JUDICIAL DISTRICT
	§	
	§	
VS.	§	ORANGE COUNTY, TEXAS
	§	
LIBERTY MUTUAL	§	
INSURANCE COMPANY	§	<u>128th</u> DISTRICT COURT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, LEAZA GREENROAD-FORD, hereinafter referred to as Plaintiff, and complains of LIBERTY MUTUAL INSURANCE COMPANY, hereinafter referred to as Defendant, and as grounds would show unto the court the following:

I.

Plaintiff intends that discovery be conducted under Level III, Texas Rule of Civil Procedure 190.4.

II.

Plaintiff, LEAZA GREENROAD-FORD is the owner of the residential property made the subject of this suit, which is situated in Orange County, Texas.

Defendant, LIBERTY MUTUAL INSURANCE COMPANY, is a corporation doing business in the venue and jurisdiction of this Court, who may be served by serving its registered agent/attorney for service, CORPORATION SERVICE COMPANY, located at 211 East 7th Street, Suite 620, Austin, TX 78701-3218.

III.

The Court has jurisdiction over Defendant, LIBERTY MUTUAL INSURANCE COMPANY because Defendant is a company doing business in the State of Texas and has purposefully established minimum contacts with the State of Texas. The court has jurisdiction over the controversy because the damages are within the jurisdictional limits of the court.

IV.

Venue is proper in Orange County, Texas because the events made the basis of this suit took place in Orange County, Texas and the property made the subject of this claim is located in Orange County, Texas.

V.

This lawsuit is brought against Defendant insurance carrier for recovery of costs of repair to Plaintiff's residence cause by Hurricane Harvey. LIBERTY MUTUAL INSURANCE COMPANY, Defendant, sold a policy of homeowner's insurance to Plaintiff and contracted to indemnify Plaintiff for all losses caused by windstorm. On or about August 29, 2017, Hurricane Harvey caused extensive damages to Plaintiff's residence located at 1106 West Cherry, Orange, Orange County, Texas. Such costs of repair are estimated to be

\$176,742.46. Plaintiff made proper claim for all costs of repair as required under the policy and allowed Defendant insurance company representatives and adjusters access to the property for thorough inspection and appraisal. To date, Defendant LIBERTY MUTUAL INSURANCE COMPANY, its agents, servants, employees and representatives have failed to indemnify and compensate Plaintiff for their costs of repair.

VI.

Plaintiff bring this suit pursuant to Articles 541 and 542, et seq. of the Texas Insurance Code for all costs of repair and damages to their residence caused by Hurricane Harvey. The evidence will likely show:

- 1) Defendant and its representatives knowingly misrepresented to claimants pertinent facts or policy provisions relating to the coverage at issue;
- 2) Defendant and its representatives failed to acknowledge with reasonable promptness pertinent communications relating to the claim;
- 3) Defendant and its representatives failed to adopt and implement reasonable standards for the prompt investigation of the claim;
- 4) Defendant and its representatives failed to attempt in good faith, a prompt, fair and equitable settlement of the claim submitted in which liability has become clear;

- 5) Defendant and its representatives have compelled claimants to institute suit by offering substantially less than the amounts Plaintiffs will likely recover in suit;
- 6) Defendant and its representatives have negligently or intentionally refused to pay the proper amount due under the policy.

The foregoing acts and omissions were a proximate cause of Plaintiffs damages.

VII. DAMAGES

Plaintiff would show that the reasonable and necessary costs of repair caused by Hurricane Harvey are \$176,742.46 for which suit is brought. Plaintiff further alleges that additional cost of repairs will likely be found as construction proceeds on the residence.

X. EXPENSES

Plaintiff bring this lawsuit for recovery of all costs of expenses related to the lawsuit and for all statutory penalties, interest and punitive damages allowed by law.

XI. PRAYER

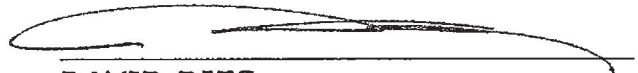
WHEREFORE PREMISES CONSIDERED, Plaintiff prays that Defendant be cited to appear and answer herein and that upon final hearing, Plaintiff have judgment over and against the Defendant, judgment for all damages and injuries alleged herein which are in excess of the minimum jurisdictional limits

of this Court, and further that Plaintiff have over and against all named Defendant herein such judgment together with punitive damages, prejudgment interest, post-judgment interest at the legal rate of interest, attorney's fees that are reasonable and necessary that are allowed by law, costs of Court, all other damages as allowed by law and for such other and further relief, both general and specific, in law and in equity, for which Plaintiff may show herself justly entitled.

PLAINTIFF RESPECTFULLY REQUESTS A TRIAL BY JURY.

Respectfully submitted,

DIES LAW OFFICES



DAVID DIES

State Bar #05850800

1703 Strickland Drive

Orange, Texas 77630

rherford@dieslaw.com

(409) 883-0892

(409) 670-0888 - Facsimile

ATTORNEYS FOR PLAINTIFF

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL



7018 1130 0001 3716 1068

FROM:

Joe L. Chane

710 Hickory Dr

Orange Texas 77632

U.S. POSTAGE PAID
FCM LG ENV
BEAUMONT, TX
AUG 05 19
AMOUNT
\$7.75
R2305K131392-46



76701



1000

TO:

Liberty Mutual Ins. Co.

Attn: Compensation Services Dept.

211 East 9th St Suite 260

Austin Texas 78701-3218

Photo Document Mailer

09/04/19

ReadyPost